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To: Earl Liverman/R10/USEPA/US@EPA
Subject: Avery - preliminary assessment of draft EE/CA
Date: 02/03/2010 09:52 AM

Earl –

This is a preliminary assessment of the draft Engineering Evaluation / Cost Analysis (EE/CA) for the Avery Landing Site prepared by Golder for Potlatch and dated January 22, 2010.

In general, the draft EE/CA seems to arrive at predetermined conclusions regarding the nature and extent of contamination, the contaminants of potential concern (COPCs), risk, and the effectiveness of previous cleanup efforts, without adequate support or documentation.

Our preliminary general comments are summarized below:

- The discussion of the nature and extent of contamination focuses on the predetermined conclusion that the petroleum contamination originated upgradient from Potlatch property (i.e., from the former above-ground storage tank in the highway right-of-way), and doesn't consider other potential sources from historic site operations on Potlatch property. Nor does the draft EE/CA consider potential impacts to the extent of contamination from the treatment system (operated by Potlatch) that pumped contaminated groundwater into the subsurface north of Highway 50.
- The draft EE/CA report includes many of the same conclusions about the extent of contamination, potential sources, and the conceptual site model that were presented in their EE/CA planning documents. At the time, those conclusions were not well supported and were irrelevant to the purpose of the documents. In the draft EE/CA, it is not clear that these conclusions have been reevaluated in light of data collected during the 2009 field activities, and it raises the question that the draft EE/CA has been written to reach forgone conclusions.
- The draft EE/CA repeats a mistake from the draft work plan in referring to the 2007 EPA removal assessment report (referring to it as the site-specific sampling plan and not the removal assessment report). EPA notified Potlatch/Golder of this mistake, and it was corrected in the final work plan. While this mistake itself is insignificant, it raises questions about quality control and to what degree Potlatch/Golder has been responsive to more substantive EPA comments.
- The CSM does not provide adequate depictions of analyte migration pathways and assumptions for complete/incomplete exposure pathways are not supported.
- Overall, the discussion of COPC selection does not provide a clear and justifiable rationale for elimination of chemicals from further consideration when they are present at levels that exceed screening levels. Also, the COPC selection process is not consistent with EPA risk assessment guidance.
- For the streamlined risk assessment, the EECA primarily relied on risk assumptions from the Idaho Risk Evaluation Manual, and not EPA guidance. Generally, the Idaho defaults are less conservative than EPA's default assumptions. Several of the default assumptions in the draft EE/CA are based on professional judgment in the guidance, even though EPA has data available for use.
- Based on a preliminary review, the evaluation of removal alternatives appears to be inadequate, especially for treatment options. Considering that the draft EE/CA's preferred alternative is institutional controls, it seems that the engineering evaluation was cursory and conceptual.
- The recommendation of institutional controls as the preferred alternative implies that the controls currently in place have been sufficient to control site

contamination and prevent off-site migration. However, if existing control methods have been sufficient, then why the need to perform a non-time critical removal action and EE/CA in the first place? Additionally, the draft EE/CA exaggerates the effectiveness of these controls and the degree to which Potlatch has employed them.

Please let me know if you have any questions or need anything else.

Thanks,
Steve

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